

CITY OF



February 3, 1993

Office of the Secretary
of the Federal Communication Commission
1919 M Street, Room 222
Washington, D.C. 20554

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We appreciate the opportunity to offer comments on proposed regulation rules concerning cable television.

The City of Ottawa, Kansas, population 11,000, is a CATV franchising authority in the midst of a franchise renewal.

We urge you to make the rules as simple and inexpensive as possible. The 3 year formal renewal process is too long and complicated. We suggest a 3 month process. The same process could also be used to revoke a franchise.

We favor the "benchmark" rate regulation method based on cost, services offered and competition. It could well be an average of the regional rates per channel, unless the cable company could prove higher than average cost of operation. Benchmark rates should be published periodically by an appropriate authority for easy comparison by the franchise authority. The process of challenging a higher than average rate should be simple and fast. A suggested procedure is (1) Notification by the franchise authority to the cable company of an excessive rate per channel based on a published average rate for the region. (2) The cable company would then have the choice of either lowering the rate or appearing along with the franchise authority at a hearing conducted within the affected franchise area by a Federal Communication Commission appointed hearing officer. The findings at the hearing would determine the outcome as to whether the rate is affirmed or lowered.

We strongly urge you to speed up and simplify rate and renewal procedures. We feel franchise authorities have been restricted in the past, and today depend more on the Federal Communication Commission to